

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BURGIOUS FRAZIER, JR., YOSUB KIM, WAYNE
KRUG, BEN PEREZ, VANESSA SZAJNBERG,
NICHOLAS TAPALANSKY, and SHELLY YIP,

Petitioners,

-against-

X. CORP f/k/a TWITTER, INC. and X HOLDINGS
CORP f/k/a X HOLDINGS I, INC.,

Respondents.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, upon the accompanying Petition, Memorandum of Law, and the Declaration of Akiva M. Cohen dated March 21, 2024, Petitioners Burgious Frazier, Jr., Yosub Kim, Wayne Krug, Ben Perez, Vanessa Szajnberg, Nicholas Tapalansky, and Shelly Yip respectfully move this Court for an Order, pursuant to 9 U.S.C. § 4, compelling Respondent to arbitrate Petitioners' claims in accordance with the terms of the parties' Dispute Resolution Agreement, including the provisions thereof that require Respondents to pay arbitral fees in accordance with the rules of JAMS in the absence of governing New York law mandating any other division of fees.

Per Local Rule 6.1(b), opposing affidavits and answering memoranda, if any, shall be served within fourteen days of service of the moving papers, and reply affidavits and memoranda of law shall be served within seven days after service of the answering papers.

Dated: March 21, 2024
New Brunswick, New Jersey

Respectfully Submitted,

Kamerman, Uncyk, Soniker & Klein P.C.

/s/ Akiva M. Cohen

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